

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 STEPHEN GRAY, individually and on behalf of all others similarly situated, Plaintiff, v. Defendants. : Civil Action No: 07 Civ. 9790 (SHS)

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Plaintiff, v. Defendants. : **MOTION FOR ADMISSION OF ROBERT IZARD PRO HAC VICE**

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. Defendants. : Civil Action No: 07 Civ. 10294 (DC)

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10, Plaintiff, v. Defendants. :

MEREDITH TRANBERG, individually and on behalf of all others similarly situated Plaintiff, v. Defendants. : Civil Action No: 07 Civ. 10341 (UA)

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Plaintiff, v. Defendants. :

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U.S. DISTRICT COURT
S.D. OF N.Y.

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-----X
ANTON RAPPOLD, individually and on :
behalf of all others similarly situated, :
: Plaintiff, : Civil Action No: 07 Civ. 10396 (UA)
v. :
: CITIGROUP INC., CITIBANK, N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :
: Defendants. :
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SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :
: Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)
v. :
: CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
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and JOHN DOES 21-40 (BEING :
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OF THE CITIGROUP INC. 401(K) PLAN), :
: Defendants. :
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 STEPHAN FIORINO, individually and on behalf of all others similarly situated, :
 Plaintiff, : Civil Action No: 07 Civ. 10458 (UA)
 v. :
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 CITIGROUP INC., CITIBANK N.A., :
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 INVESTMENT COMMITTEE, and :
 JOHN DOES 1 - 20, :
 :
 Defendants. :
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JAMES BOLLA, individually and on behalf of all others similarly situated, :
 Plaintiff, : Civil Action No: 07 Civ. 10461 (UA)
 v. :
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CITIGROUP INC., CITIBANK N.A., :
 CHARLES PRINCE, THE PLANS :
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 JOHN DOES 1 - 20, :
 :
 Defendants. :
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MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly, :
 Plaintiff, : Civil Action No: 07 Civ. 10472 (UA)
 v. :
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CITIGROUP, INC., CITIBANK, N.A., :
 THE PLAN ADMINISTRATIVE :
 COMMITTEE OF CITIGROUP, INC., :
 MICHAEL E. SCHLEIN, JOHN DOES :
 1-10, THE CITIGROUP 401(k) PLAN :
 INVESTMENT COMMITTEE and JOHN :
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DOES 10-20, C. MICHAEL	:
ARMSTRONG, ALAN J.P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ, ANN DIBBLE JORDAN,	:
ANDREW N. LIVERIS, DUDLEY C.	:
MECUM, ANNE M. MULCAHY,	:
RICHARD D. PARSONS, ANDRALL E.	:
PEARSON, CHARLES PRINCE, JUDITH	:
RODIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, SANFORD I. WEILL,	:
	:
Defendants.	:

-----x

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, William Bernarduci, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Robert Izard. Mr. Izard's address is:

Schatz Nobel, Izard, P.C.
 20 Church Street, Suite 1700
 Hartford, Connecticut 06103
 Phone Number: (860) 493 6292
 Fax Number: (860) 493 6292
rizard@snilaw.com

Robert Izard is a member in good standing of the Bar of the State of Connecticut. He was admitted to the Connecticut bar on May 28, 1987. Attached hereto as Exhibit A is a Certificate of Good Standing. Mr. Izard has subsequently been admitted to practice in the following courts:

- a. United States District Court for the District of Connecticut (1987);
- b. All Courts of the State of North Carolina (1983);
- c. United States District Court for the Middle District of North Carolina (1985);
- d. United States District Court for the Western District of North Carolina (1983);
- e. United States Court of Appeals for the Fourth Circuit (1986);

- f. United States Court of Appeals for the Second Circuit (1990);
- g. United States Supreme Court (1991);
- h. United States District Court for the District of Colorado (2001);
- i. United States Court of Appeals for the First Circuit (2006); and
- j. United States Court of Appeals for the Fifth Circuit (2006)

Dated: January 16, 2008

Respectfully submitted,

SCHATZ NOBEL IZARD, P.C.



William Bernarduci (WB 5785)
20 Church Street, Suite 1700
Hartford, Connecticut 06103
Phone Number: (860) 493 6292
Fax Number: (860) 493 6292



**State of Connecticut
Supreme Court**

I, Michéle T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,

Do hereby certify that, in the Superior Court at Hartford
on the twenty-eighth day of May
1987

Robert A. Izard, Jr.

of

West Hartford, Connecticut

having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, and that said attorney is a member in good standing of the Bar of this State pursuant to Practice Book §2-65.

*In Testimony Whereof, I have hereunto set my hand and affix
the Seal of the Supreme Court of the State of Connecticut, at
Hartford, this sixteenth day of
January 20 08*

Michéle Angers
Michéle T. Angers

Chief Clerk



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of January 2007, a copy of the foregoing was served by U.S. Mail, postage pre-paid, to the counsel of record on the attached service list. Parties may also access this filing through the Court's system.



Nancy A. Kulesa

**CITIGROUP ERISA LITIGATION
SERVICE LIST**

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Bradley R. Wilson, Esq.
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al.

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Fax: (212) 753-3630

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(07cv10442-SHS)

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(07cv10341-UA)

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(07cv10472-UA)

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T: (212) 385-0066

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 STEPHEN GRAY, individually and on behalf of all others similarly situated, :
 Plaintiff, :
 v. :
 :
 CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, :
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 Defendants. :
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Civil Action No: 07 Civ. 9790 (SHS)

DECLARATION OF WILLIAM BERNARDUCI IN SUPPORT OF MOTION FOR ADMISSION OF ROBERT IZARD PRO HAC VICE

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated, :
 Plaintiff, :
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 CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10, :
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Civil Action No: 07 Civ. 10294 (DC)

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U.S. DISTRICT COURT
CLERK'S OFFICE

MEREDITH TRANBERG, individually and on behalf of all others similarly situated :
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Civil Action No: 07 Civ. 10341 (UA)

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INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :
Defendants. :

SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :
Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)

CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
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KENNETH T. DERR, JOHN M. DEUTCH, :
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A. THOMAS, SANFORD I. WEILL, :
: Defendants. :
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I, William Bernarduci, hereby declare as follows:

1. I am an attorney at Schatz Nobel Izard, P.C., counsel for Plaintiff, Shaun Rose, in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Robert Izard as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York on November 24, 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Robert Izard since 2004.
4. Mr. Izard is a partner at Schatz Nobel Izard, P.C., in Hartford, Connecticut.
5. I have found Mr. Izard to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Robert Izard pro hac vice.
7. I respectfully submit a proposed order granting the admission of Robert Izard, pro

hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Robert Izard pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: January 16, 2008



William Bernarduci (WB 5785)
20 Church Street, Suite 1700
Hartford, Connecticut 06103
Phone Number: (860) 493 6292
Fax Number: (860) 493 6292

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**[PROPOSED] ORDER ADMITTING
ROBERT IZARD PRO HAC VICE**

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PEARSON, CHARLES PRINCE, JUDITH :
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A. THOMAS, SANFORD I. WEILL, :
: Defendants. :
-----x

Upon the motion of attorney William Bernarduci for admission of Robert Izard pro hac vice, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Robert Izard
20 Church Street, Suite 1700
Hartford, Connecticut 06103
Phone Number: (860) 493 6292
Fax Number: (860) 493 6292

is admitted to practice pro hac vice as counsel for in the above captioned case in the United States District Court for the Southern District of New York.

Dated: _____

Sidney Stein United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of January 2007, a copy of the foregoing was served by U.S. Mail, postage pre-paid, to the counsel of record on the attached service list. Parties may also access this filing through the Court's system.



Nancy A. Kulesa
Nancy A. Kulesa

**CITIGROUP ERISA LITIGATION
SERVICE LIST**

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al.

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(07cv10442-SHS)

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(07cv10461-UA)

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(07cv10341-UA)

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Attorneys for Plaintiff Mark Geroulo
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